

EMAIL

Date: June 19, 2019

EMAIL: ADEC Air Quality Management Division
(dec.aq.airreports@alaska.gov)

From: Brad Broker (907) 659-7242
NS Environmental Coordinator

Number of Pages including Cover 3

Comments:

 x Permit Deviation – April 30, 2019

 Excess Emission

Attached please find a Permit Deviation report for Permit Number
AQ0267TVP01 that occurred on April 30, 2019.

Please contact me with any questions.

FILE – 9.7b
PC Docs

Section 20. ADEC Notification Form

Fax this form to: (907) 451-2187

Telephone: (907) 451-5173

ConocoPhillips Alaska, Inc.

Company Name

Kuparuk Central Production Facility #1

Facility Name

Reason for notification:

☐ **Excess Emissions**

If you checked this box

Fill out section 1

☒ **Other Deviation from Permit Condition**

If you checked this box

fill out section 2

When did you discover the Excess Emissions or Other Deviation:

Date: 6/14/2019

Time: 09:00

Section 1. Excess Emissions

(a) Event Information (Use 24-hour clock):

START Time:

END Time:

Duration (hr:min):

Total:

(b) Cause of Event (Check all that apply):

☐ START UP

☐ UPSET CONDITION

☐ CONTROL EQUIPMENT

☐ SHUT DOWN

☐ SCHEDULED MAINTENANCE

☐ OTHER

Attach a detailed description of what happened, including the parameters or operating conditions exceeded.

(c) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

<u>Source ID</u> <u>No.</u>	<u>Source Name</u>	<u>Description</u>	<u>Control Device</u>

(d) Emission Limit Potentially Exceeded

Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.

<u>Permit Condition</u>	<u>Limit</u>	<u>Emissions Observed</u>

(e) Excess Emission Reduction:

Attach a description of the measures taken to minimize and/or control emissions during the event.

(f) Corrective Actions:

Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.

(g) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?

YES NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

YES NO

Section 2. Other Permit Deviations

(a) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

<u>Source ID No.</u>	<u>Source Name</u>	<u>Description</u>	<u>Control Device</u>
N/A	N/A	Stationary source	N/A

(b) Permit Condition Deviation:

Identify each permit condition deviation or potential deviation. Attach additional sheets as necessary.

<u>Permit Condition</u>	<u>Potential Deviation</u>
10.4. Report using the operating report under condition 88, the monthly fuel consumption (MMscf/month for gas-fired emission units and gallons/month for liquid fuel-fired emission units) for each emission unit group (turbines, heaters, engines, flared, incinerators, drill site heaters, drill rig engines, drill rig heaters and boilers, rig camp engines, well service heaters, well service engines, and well frac unit engines), and the stationary source total fuel consumption, for each month covered by the reporting period.	The monthly fuel consumption for each emission unit group was submitted as required; however the stationary source total fuel consumption for each month was not included in the operating report submitted on April 30, 2019 for the January 1 through March 31, 2019 reporting period.
88.1. The operating report must include all information required to be in operating reports by other conditions of this permit.	CPAI did not include all the information required by Condition 10.4 of the permit.
90. The Permittee must comply with each permit term and condition.	CPAI did not comply with each permit term and condition.

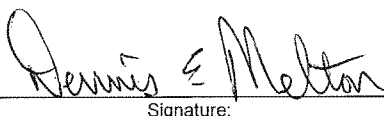
(c) Corrective Actions:

Attach a description of actions taken to correct the deviation or potential deviation and to prevent recurrence.

The reporting tool has been updated to include this information on the report, and the report review procedure has been updated to verify this information is included.
The missing data will be submitted with the operating report for the April 1 through June 30, 2019 reporting period.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Dennis Melton
Printed Name:


Signature:

6/19/2019
Date: